

April 25, 2014

SE-5J

Steve Garbaciak, Jr. P.E.
Vice-President
Sediment and Waterfront Group
ARCADIS – BBL Inc.
10 South Riverside Plaza, Suite 1900
Chicago, Illinois 60606

Re: Former Plainwell Impoundment 2010 Bank Conditions Monitoring Report Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site dated January 26, 2011

Dear Mr. Garbaciak:

The United States Environmental Protection Agency (U.S. EPA) and Michigan Department of Natural Resources and Environment (MDNRE) have reviewed the 2010 Bank Monitoring Report for the Former Plainwell Impoundment and have the following comments:

1. Some of the 2010 transects are truncated when compared to previous years' surveys. An explanation for why the data was collected in this fashion should be explained in the report. Future transect data collections should extend for the length of the previous transects so a full comparison between years' is possible.
2. Section 4.2, Comparison of Surveyed Banks – Some of the text descriptions in this section appear to be inconsistent with the bank profiles. Some of the bank profiles show erosion between the 2009 and 2010 monitoring events and needs to be more clearly indicated in the text description (e.g. T-2S, T-4N, T-4S, T-6S). The issue of the truncated profiles plays into limiting the utility of the descriptions.

If you have any questions regarding these comments please contact me at (312) 353-8360.

Sincerely,

Sam Borries
On-Scene Coordinator